

PATENT
09/714,725

3, 2005.

REMARKS

The rejection of claims 1-4, 6-11, 13-18, and 20-21 as being unpatentable under 35 USC 102(e) as anticipated by Bauersfeld et al. (US6,195,679) is respectfully traversed.

It is submitted that a rejection based on anticipation under 35 U.S.C. 102, must expressly or impliedly teach every element of invention without modification. The Examiner's application of the Bauersfeld patent does not meet this standard.

Both the present invention and Bauersfeld are directed to searching or browsing on the Work Wide Web i.e. backtracking through where the user has been and passed in his navigation in the Web in a particular session.

The present claimed invention does the tracking of a browsing session by starting with a starter received Web document, and then selecting a set of subsequently received Web documents as a set of subsequent or next documents using means for creating a hyperlink in each of the starter and next documents respectively to their next document in the set. The actual and received starter and next documents are stored at the receiving display station to thereby store a selected string of linked actual Web documents or pages at the receiving station.

Bauersfeld fails to disclose means for creating a hyperlink in each of the starter and next documents respectively to their next document in the set. There are no hyperlinks whatsoever created in Bauersfeld's Web documents in either a starter or next document. The Examiner points to a "Forward" 404 button in a tool bar in Bauersfeld as equivalent to a hyperlink in the present hypertext Web documents which links the Web document to a

PATENT
09/714,725

subsequent Web document.

Firstly, the Forward Button in Bauersfeld's tool bar is not a "hyperlink". The Microsoft Computer Dictionary, 5th Edition, 2002, Redmond, Washington defines a "Hyperlink" as "A connection between an element in a hypertext document andanother document..."

The "Forward" and "Back" buttons in Bauersfeld are not links in any hypertext documents. The buttons merely sequentially move a sequence of Web documents forward and back. The buttons are clearly not in any specific hypertext Web document. The same buttons can move any number of sequential Web documents in Bauersfeld. The Forward and Back buttons in the Tool Bar of Bauersfeld are not in any hypertext Web document in a sequence of Web documents. The same Forward and Back buttons are permanently fixed in the toolbar 401, 501, or 601. The toolbar is not a hypertext document. It is part of display station permanent Graphical User Interface.

Therefore, it is submitted that the above described remote interpretation of how the toolbar "Forward" button in Bauersfeld is equivalent to Applicants' hyperlink is not specific enough to meet the requirements of 35 U.S.C. 102. The statute requires the reference to expressly or impliedly teach every element of invention without modification. It would certainly take very significant modification for the "Forward" button of Bauersfeld to function as a hyperlink in a Web document in the sequence of Web documents of the present invention.

Dependent claims 2-7, 9-14, and 16-21 are patentable over Bauersfeld for the reasons given above for the patentability of independent claims 1, 8, and 15. However, in addition, these claims set forth the elements of

AUS920000748US1

3

BEST AVAILABLE COPY

PATENT
09/714,725

selecting a subsequently received Web document, and creating a hyperlink in a first Web document to that subsequently received Web document. Bauersfeld does not disclose this! The "Forward" button in its tool bar is a permanent object independent of the Web documents, and not created in any subsequently received Web document. 35 U.S.C. 102 requires Bauersfeld to expressly or impliedly teach every element of invention without modification. It would require an extraordinary modification of Bauersfeld for the reference to even suggest the invention defined in the above dependent claims.

The rejection of dependent claims 5, 12, and 19 under 35 U.S.C. 103(a) over Bauersfeld in view of Nielson, (US6,021,435) is respectfully traversed. Claims 5, 12, and 19 are submitted to be patentable for the reasons set forth above for dependent claims. In addition, these claims set forth that the created hyperlink in the Web document is highlighted. Applicants will concede that Nielson discloses the highlighting of hyperlinks. However, claims 5, 12, and 19 are still submitted to be patentable as set forth above.

AUS920000748US1

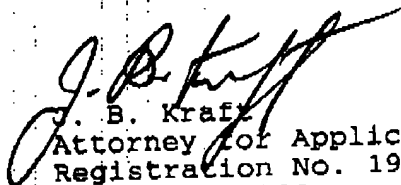
4

BEST AVAILABLE COPY

PATENT
09/714,725

In view of the foregoing, claims 1-21 are submitted to
be in condition for allowance, and such allowance is
respectfully requested.

Respectfully submitted,


J. B. Kraft
Attorney for Applicants
Registration No. 19,226
(512) 473-2303

PLEASE MAIL ALL CORRESPONDENCE TO:

Herman Rodriguez
IPLaw Dept. - IMAD 4054
IBM Corporation
11400 Burnet Road
Austin, Texas 78758

AUS920000748US1

5

BEST AVAILABLE COPY